UNITED STATES BANKRUPTCY COURT DISTRICT OF MASSACHUSETTS

In re:
NOEL, WENDY E.,
Debtor(s)

Chapter 7 Case No. 10-22717 FJB

MOTION OF CHAPTER 7 TRUSTEE TO EXTEND DEADLINE TO OBJECT TO THE DEBTOR'S DISCHARGE

Lynne F. Riley, Chapter 7 Trustee ("Trustee") in the above-referenced proceeding, respectfully moves this Court for an order extending the deadline by which the Trustee may object to the Debtor's discharge. In support of this motion, the Trustee states as follows:

- 1. The Debtor filed a Chapter 7 petition on November 22, 2010, and Lynne F. Riley was duly appointed Chapter 7 Trustee of this bankruptcy estate.
- 2. On December 22, 2010, the Trustee conducted the first meeting of creditors pursuant to 11 U.S.C §341 of the Bankruptcy Code.
- 3. Subsequent to the §341 meeting, the Trustee requested certain information and documents from the Debtor.
- 4. To date, the Trustee has not received the materials requested.
- 5. Based on the forgoing, the Trustee requests an additional sixty (60) days, to and including April 22, 2011 to object to the Debtor's discharge, so that she can obtain and review information requested from the Debtor, and further examine the Debtor on potential estate assets and/or causes of action.

WHEREFORE, the Trustee respectfully requests an order allowing the Trustee an additional sixty (60) days from the current deadline date of February 21, 2011 to an extension date of April 22, 2011, object to the Debtor's discharge, and granting such other relief as the Court deems just and appropriate.

Respectfully submitted, Chapter 7 Trustee

/s/ Lynne F. Riley
Lynne F. Riley, BBO# 561965
Riley Law Group LLC
100 Franklin Street
Boston, MA 02110
Email: riley@rileylawgroup.com

Tel: (617) 399-7300

CERTIFICATE OF SERVICE

I, Lynne F. Riley, hereby certify that on February 16, 2011, I served a copy of the foregoing, electronically, on the following:

Office of the United States Trustee John. W. McCormack Post Office and Court House 5 Post Office Square, Suite 1000 Boston, MA 02109-3945

Frederick C. Diamond 23 VFW Parkway Revere, MA 02151 (Debtor's Counsel)

Dated: February 16, 2011

/s/ Lynne F. Riley